



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

May 4, 2004

Don Rasch
Department of Energy
1955 Fremont Avenue
Idaho Falls, Idaho 83401-1216

RE: March 2, 2004 Request for No Longer Contained In Determination (NLCID)
(EPA ID No. ID489008952)

Dear Mr. Rasch:

The Department of Environmental Quality (DEQ) has received and reviewed the Department of Energy's request for a NLCID for soils impacted by discharged purge waters. Having evaluated the analytical results and associated risk presented in the request, the DEQ has the following comments:

- Although it is DEQ's intent to approve this request, DEQ concurs that calculating cancer risk based on non-detection results is not a productive effort. It is clear that risk calculations included assumed levels associated with non-detection results, and that approximately 97% of the calculated risk was due to eight constituents not usually found in the ground water (e.g. N-methyl-N-nitrosomethylamine, bis (2-chloroethyl) ether, N-nitrosodipropylamine, hexachlorobenzene, N-nitrosomethylethylamine, N-nitrosodiethylamine, N-nitrosopyrrolidine, and 3,3'-Dimethylbenzidine).
- Although metal constituents were detected in soil samples whereby risk was calculated, the detections/concentrations were at or near known background concentrations at the INEEL.

Based on a comprehensive review of the referenced request, DEQ hereby approves the requested determination for soils impacted by the release of approximately 210 gallons of purge water on October 8, 2002.

If you have any questions, please contact Dennis Owsley at (208) 373-0426.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian R. Monson", written over a horizontal line.

Brian R. Monson
Hazardous Waste Program Manager
Waste Management & Remediation Division

BRM/DC/tg c:\...Unpublished\Netmon\ecil (4-23-04).doc

cc: Jeff Hunt, EPA Region X
INGD. Owsley

Carolyn Mascarenas, BBWI
COF